

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SHEET METAL WORKERS LOCAL 265)	
WELFARE FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 11 C 8464
)	
AMCO, INC., an Illinois corporation,)	JUDGE SHARON JOHNSON COLEMAN
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on January 17, 2012, request this Court enter judgment against Defendant, AMCO, INC., an Illinois corporation. In support of their Motion, Plaintiffs state:

1. On January 17, 2012, this Court entered default against Defendant and granted Plaintiffs' request for an order directing Defendant to turn over its monthly fringe benefit contribution reports for August 2011 through the present within 14 days of the entry of the order. The Court also entered an order that judgment would be entered after Defendant submitted its contribution reports and Plaintiffs determined the amount due and owing from Defendant.

2. On February 4, 2012, Defendant submitted its monthly fringe benefit contribution reports for October 2011 through December 2011. The contribution reports show that the Defendant is delinquent in contributions to the Funds for the stated months in the amount of \$37,092.56. (See Affidavit of Scott P. Wille).

3. Additionally, the amount of \$3,709.26 is due for liquidated damages. (Wille Aff. Par. 5).

4. In addition, Plaintiffs have incurred costs totaling \$435.00 and reasonable attorneys' fees totaling \$777.25. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$42,014.07.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$42,014.07.

/s/ Jennifer L. Dunitz-Geiringer

Jennifer L. Dunitz-Geiringer
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 21st day of February 2012:

Ms. Cynthia Lynn Schlender, Registered Agent/President
AMCO, Inc.
9100 Route 176
Crystal Lake, IL 60014

/s/ Jennifer L. Dunitz-Geiringer

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